

CiDRA Minerals Processing Inc. - Privacy Policy

Effective Date: June 1, 2025

CiDRA Minerals Processing Inc., including its parent, subsidiaries, affiliates, and related companies (“CiDRA,” “we,” “us,” or “our”) respects your privacy and is committed to protecting the personal data we collect and process. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data, and your rights regarding that data.

CiDRA respects the privacy of the users of its products and services and is committed to protecting their privacy and maintaining their trust. This Policy applies to data collected through our products, services, websites, portals, applications, and during any other interaction with CiDRA, including in-person, email, text, and other electronic communications and global operations. We process personal data in accordance with applicable data protection laws, including the **General Data Protection Regulation (GDPR)**, the **California Consumer Privacy Act (CCPA/CPRA)**, and other relevant global privacy regulations. Please read this Privacy Notice carefully to understand our policies and practices regarding treatment of personal data. By accessing our website and/or using our products or services, you consent to our collection, use, and disclosure of personal data as described in this Privacy Notice. If you have a privacy question or concern, please contact us per the “Contact Us” information at the bottom of this Privacy Notice.

1. Who We Are

CiDRA Minerals Processing Inc. is a U.S.-based company headquartered in Connecticut. We provide advanced industrial process optimization solutions to industrial locations around the world, and operate at more than 700 mine sites in over 70 countries. Although we have offices globally, any data processing that is not completed locally at the customer site mostly occurs in the United States.

2. Data We Collect

We may collect the following categories of information, depending on your interaction with CiDRA:

A. Personal Data

- Name, business contact details (email address, phone number)
- Employer, job title, and location
- Information about your role and employer to provide tailored access and support
- Usernames and passwords for portal or software access
- Billing, shipping, and payment details
- Contractual information such as purchase history, subscription details, or usage records of our products and services

B. Technical and Usage Data

- IP address, browser type, operating system

- Device identifiers
- Usage data from our websites, portals, and software applications
- Diagnostic or technical logs to support system performance
- Geolocation Data - Approximate geolocation based on IP address (for analytics or security purposes)

C. Operational and Mine Site Data

We may collect non-personal and potentially sensitive industrial data through our services and our installed systems:

- **SONARtrac™ flow meter data:** flow rate, signal diagnostics, operational parameters
- **CYCLONEtrac™ particle size tracking data:** particle size distribution, cyclone performance, system health
- **P29 Technology data:** mineral characteristics, mineralogy, plant operating conditions

This operational data may include:

- Mine name, site location, mineralogy, process flows, plant configurations
- Data collected during system commissioning, calibration, troubleshooting, monitoring, and support activities

While this data is typically non-personal, it may be linked to a user account or associated with a business contact for support or contractual services. We do **not** knowingly collect sensitive personal information (e.g., Social Security numbers, biometric data, medical information, or data revealing racial or ethnic origin) through our Services.

3. How We Collect Information

We collect personal information in the following ways:

- **Directly from you** when you request support, register for an account, or access our customer portal
- **Automatically** through your use of our Services (e.g., via cookies, log files, or analytics tools)
- **From your employer or authorized users** as part of our business relationships
- **From service providers** who support our business operations

4. How We Use Your Data

We collect and process personal information for the following purposes:

Purpose	Lawful Basis under GDPR
To provide products and services, including system commissioning, calibration, support, and troubleshooting	Performance of a contract
To manage business relationships, contracts, and billing	Performance of a contract
To process user accounts for data portals and services	Legitimate interest / Consent
To communicate regarding support, maintenance, and updates	Legitimate interest
To comply with legal obligations	Legal obligation
To improve our products and services through analytics and diagnostics	Legitimate interest
To respond to inquiries and requests	Legitimate interest / Consent
For marketing and promotional communications, where permitted	Consent

We do **not** use personal information for profiling that produces legal or similarly significant effects on individuals.

5. Sharing and Disclosure of Your Data

We do not sell your personal data.

We may disclose personal information with:

- Our affiliates and subsidiaries
- Authorized representatives, agents, and distributors
- Service providers assisting with IT, cloud hosting, analytics, customer support, or marketing
- Your employer or authorized administrators for account management
- Law enforcement or other authorities as required by law or to protect legal rights
- In connection with a business transaction (e.g., merger, acquisition, or asset sale), subject to confidentiality obligations

All third-party recipients are contractually bound to use personal information only as instructed by CiDRA. Where data is transferred outside the country of collection, we ensure appropriate safeguards are in place (e.g., Standard Contractual Clauses for transfers from the EU).

6. Data Retention

We retain personal information as long as necessary:

- To provide our Services and fulfill contractual obligations
- To comply with legal, accounting, and regulatory retention requirements
- For legitimate business needs (e.g., fraud prevention, system troubleshooting)

Operational data may be retained longer for performance benchmarking or historical system tracking unless otherwise agreed. When no longer needed, we securely delete or anonymize data.

7. Data Security

We use appropriate technical and organizational measures to safeguard your personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. This includes encryption, access controls, and internal audits.

However, no system can guarantee absolute security. You are responsible for maintaining the confidentiality of your user credentials.

8. International Transfers

As a U.S.-based company with global operations, data may be transferred to and processed in the United States or other jurisdictions with different data protection laws. For transfers from the European Economic Area (EEA) or the UK, we rely on:

- Adequacy decisions
- Standard Contractual Clauses (SCCs)
- Other appropriate safeguards under GDPR

9. Your Rights and Choices

Depending on your jurisdiction, you may have the following rights:

- Access or correct your personal information
- Request deletion of your data
- Object to or restrict certain processing
- Withdraw consent, if applicable
- Lodge a complaint with a data protection authority

Under GDPR:

- Right to access your personal data
- Right to rectification
- Right to erasure (“right to be forgotten”)

- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to lodge a complaint with a supervisory authority

Under CCPA/CPRA (California):

- Right to know what personal data is collected, used, shared
- Right to request deletion
- Right to opt-out of the sale or sharing of personal data
- Right to correct inaccurate data
- Right to non-discrimination for exercising your privacy rights

To exercise these rights, please contact us as described below.

10. Cookies and Tracking

Our websites and portals may use cookies and similar tracking technologies to authenticate users, enhance user experience, analyze site traffic, and enable platform functionality. You can manage cookie preferences via your browser or website settings. Disabling cookies may affect functionality.

11. Third-Party Services

This Privacy Policy applies only to CiDRA's Services. Our Services may link to third-party websites or platforms. We are not responsible for their privacy practices. You should review their privacy policies separately.

12. Children's Privacy

Our services are intended for professionals and businesses. We do not knowingly collect personal data from children under the age of 16.

13. Changes to this Policy

We may update this Privacy Policy from time to time. We will notify you of material changes by posting the updated policy on our website and updating the effective date. We encourage you to review this page regularly. Continued use of the Services constitutes acceptance.

14. Contact Information

For questions, requests, or complaints regarding this Privacy Policy or your personal data, please contact:

CiDRA Minerals Processing Inc.

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